



HON. SYLVIA O. HINDS-RADIX
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LAW DEPARTMENT
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September 6, 2022

VIA ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

*Application granted
Time to respond to the Complaint
extended to 12/6/22.
Conference on 10/13/22 is canceled.
§ 0 ordered.
9/7/22 J.G.Koeltl
U.S.D.J.*

Re: *L.A. obo L.H., et. al. v. N.Y.C Dep't of Educ., No. 22-6882(JGK)(GWG)*

Dear Judge Koeltl:

I am Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the matter referenced above, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act 20 U.S.C. §1400, *et. seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day extension of Defendant's time to respond to the complaint from September 6, 2022 to December 6, 2022., and to adjourn the attendant Initial Conference scheduled for October 13, 2022, *sine die*. This is the first request for an extension and Plaintiff consents. The extension will provide Defendant with sufficient time to review the entire file and administrative record, and complete the internal settlement process. We are hopeful that the parties will be able to fully resolve this matter without the need to utilize Court resources.

Accordingly, Defendant respectfully requests that the Court accept this submission and extend Defendant's deadline to respond to the complaint to December 6, 2022 and adjourn the Initial Conference, *sine die*.

Thank you for considering this request.

Respectfully submitted,

Simone Nicholson

/s/ *W. Simone Nicholson*
Special Assistant Corporation Counsel

cc: Adam Dayan, Esq., *Counsel for Plaintiffs* (via ECF)